UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

SKYLAR WILLIAMS, individually and on behalf of all others similarly situated,

Plaintiff,

Case No. 1:24-cv-02173

Hon. John R. Blakey

v.

WALMART, INC.

Defendant

<u>DEFENDANT WALMART, INC.'S UNOPPOSED MOTION FOR EXTENSION OF</u> TIME TO RESPOND TO PLAINTIFF'S COMPLAINT

Defendant Walmart, Inc., by and through its undersigned counsel, and with the agreement of Plaintiff's counsel, hereby moves this Court, pursuant to Fed. R. Civ. P. 6, for an extension of time to respond to Plaintiff's Class Action Complaint. In support of this Unopposed Motion, Walmart states as follows:

- 1. On March 15, 2024, Plaintiff filed the Class Action Complaint. ECF No. 1.
- 2. One March 22, 2024, Plaintiff served Walmart.
- 3. Walmart's response to the Complaint is currently due on or before April 12, 2024.
- 4. Walmart now requests an extension of time to respond to the Complaint, until and including May 13, 2024.
- 5. On April 4, 2024, counsel for Walmart conferred with Nick Suciu III, counsel for Plaintiff, who agreed to the extension requested herein.
- 6. Good cause exists for this extension. Walmart's counsel was recently retained in this matter and requires additional time to review the Complaint, determine how it wishes to

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respond, and draft a response that is most helpful to the Court. The parties believe that an extension

of the current response deadline up to and including May 13, 2024 would permit sufficient time

for Walmart and its counsel to do so.

7. This Unopposed Motion is not being presented to cause unnecessary delay, or for

any other improper purpose, but is sought in order to provide Walmart and its counsel adequate

time to confer and prepare an appropriate responsive pleading. Plaintiff will not be prejudiced by

the extension sought herein, and Walmart has not previously sought an extension of time to

respond to the Complaint.

WHEREFORE, Defendant Walmart, Inc. respectfully requests that this Court grant this

Unopposed Motion and enter an order allowing Walmart an extension of time, up to and

including May 13, 2024, to answer or otherwise plead in response to Plaintiff's Complaint.

Dated: April 5, 2024

Respectfully submitted,

/s/ Livia M. Kiser

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CERTIFICATE OF SERVICE

I hereby certify that on April 5, 2024, a copy of the foregoing document was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Livia M. Kiser